

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

National Association of Diversity Officers in
Higher Education, et. al.,

Plaintiffs,

v.

Donald J. Trump, in his official capacity as
President of the United States,

Defendant.

Civil Action No. 1:25-cv-333-ABA

FIRST SUPPLEMENTAL DECLARATION OF BROOKE MENSCHEL

I, Brooke Menschel, state and declare as follows:

1. I am an attorney at Democracy Forward Foundation and counsel to all Plaintiffs in the above-captioned matter. I submit this Declaration in further support of the Memorandum of Law in Support of Plaintiffs’ Motion for a Temporary Restraining Order and/or Preliminary Injunction.

2. A true and correct copy of a Washington Post article titled *Here are the words putting science in the crosshairs of Trump’s orders*, dated February 4, 2025, is attached hereto as **Exhibit 23**.

3. A true and correct copy of the transcript from a February 13, 2025 hearing, *PFLAG v. Trump*, No. 25-cv-00337 (D.Md.) is attached hereto as **Exhibit 24**.

4. A true and correct copy of a Letter from Federal Communications Commission Chairman Brendan Carr to Comcast Corporation CEO Brian Roberts regarding “Comcast and

NBCUniversal's Promotion of DEI," dated February 11, 2025, is attached hereto as **Exhibit 25**.

5. A true and correct copy of a National Endowment for the Arts webpage titled *Legal Requirements and Assurance of Compliance*, is attached hereto as **Exhibit 26**.

6. A true and correct copy of a statement from the Office of FCC Chairman Brendan Carr titled "Chairman Carr Ends FCC's Promotion of DEI," dated January 21, 2025, is attached hereto as **Exhibit 27**.

7. A true and correct copy of a letter from AmeriCorps to Plaintiff City of Baltimore, regarding "Executive Order Compliance" of Grant Number 24SCBMD002, dated February 14, 2025, is attached hereto as **Exhibit 28**.

8. A true and correct copy of a letter from AmeriCorps to Plaintiff City of Baltimore, regarding "Executive Order Compliance" of Grant Number 24SRBMD004, dated February 14, 2025, is attached hereto as **Exhibit 29**.

9. A true and correct copy of a letter from Americorps to Plaintiff City of Baltimore, regarding "Executive Order Compliance" of Grant Number 18VSAMD002, dated February 14, 2025, is attached hereto as **Exhibit 30**.

10. A true and correct copy of an AmeriCorps document, titled "Executive Order Compliance Instructions," dated February 13, 2025, is attached hereto as **Exhibit 31**.

11. A true and correct copy of a Popular Information article titled *In botched DEI purge, OSHA trashes workplace safety guidelines*, dated February 17, 2025, is attached hereto as **Exhibit 32**.

12. A true and correct copy of a Popular Information article titled *The NSA's "Big Delete,"* dated February 10, 2025, is attached hereto as **Exhibit 33**.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed: February 18, 2025

By: /s/ Brooke Menschel

Brooke Menschel